Noble Energy Inc. – Huntington Valley Oil and Gas Exploration Project
BLM Response to Public Comments on Preliminary EA

Errata, The following corrections are made to Environmental Assessment:

1. Title Page - The BLM EA file number is corrected to DOI-BLM-NV-E020-2014-0003-EA.
2. Page 227 - Bibliography- Add Patricelli, G.L., J.L. Blickley, and S. Hooper. (2010). Incorporating the impacts of noise pollution into greater sage-grouse conservation planning. 27th Meeting of the Western Agencies Sage and Columbian Sharp-tailed Grouse Technical Committee Workshop. Twin Falls, Idaho, USA.
3. Page 217- List of Preparers- Add David Jones, Air Resources Manager, BLM Nevada State Office
4. Page 27 – Water Requirements Water Supply- In response to public comments we are clarifying the following water quality issues and the following text is modified:
   - Water supply wells on private land may be used by the landowner during Noble's activities and turned over to the landowner for agricultural use once Noble's activities conclude. There would be no recovered agricultural water used for drilling (2.2.1.1.3).
   - The construction of every exploration well would meet specifications for a disposal/injection well, including proven isolation of the injection zone from all aquifers." The proven isolation would not be limited to just drinking water aquifers (2.2.1.2.3).

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Federal Agencies				
1	Special Status Species	U.S. Fish and Wildlife Service	The EA states that "Lighting during construction would follow "dark sky" practices." Nothing is mentioned either here or elsewhere I the EA regarding flaring at night – if flaring would occur or if measures would be taken to minimize impacts of flaring at night. If flaring will be done at night, the environmental impacts need to be addressed (e.g., species that may be disturbed/detrimentally attracted by the flaring).	Natural gas produced with the oil will be captured as an energy source to fuel the production equipment. Periodic flaring from flow back would be required during completions. There is no other way to manage the gas during flow back. Completion would occur during the daylight hours and therefore, there

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				would be no flaring at night.
2	Water Resources	U.S. Fish and Wildlife Service	The EA states that "'After the first year of drilling, water could be obtained by temporary conversion of agricultural water in compliance with applicable federal and state law." Is this intended to mean recovered agricultural water post use, water used for drilling instead of agriculture, or something else? If the water is recovered post agricultural use, possible contaminant issues with this water (e.g., pesticides, heavy metals, etc.) need to be addressed, such as how issues will be identified (e.g., sampling), and how the results may affect the project as proposed.	This statement is in the Decision Record and is clarified to the following: Water supply wells on private land may be used by the landowner during Noble's activities and turned over to the landowner for agricultural use once Noble's activities conclude. There would be no recovered agricultural water used for drilling.
3	Special Status Species	U.S. Fish and Wildlife Service	In the last sentence of the last paragraph of this section, the EA states that "The construction of every exploration well would meet specifications for a disposal/injection well, including proven isolation of the injection zone from all drinking use aquifers." However, municipal/domestic water supply is not the only beneficial use that could be impacted by aquifer contamination. The EA should evaluate the impacts to aquifers that are used for other beneficial uses (e.g., aquatic life, propagation of wildlife, etc.) particularly impacts to natural resources, such as ESA-listed species and other Service trust resource (e.g., migratory birds).	This statement is in the Decision Record and is clarified to the following: The construction of every exploration well would meet specifications for a disposal/injection well, including proven isolation of the injection zone from all aquifers. The proven isolation would not be limited to just drinking water aquifers
4	Water Resources	U.S. Fish and Wildlife Service	In the Escape of Hydraulic Fracturing Fluids ... section, the EA states that "The casing and cement seals are designed to prevent borehole leakage; hydraulically induced fractures typically do not extend far (beyond a few hundred feet) from the	It is stated in the EA text (Section 3.2.4.6.1 - Escape of hydraulic fracturing fluids...) that conduits cannot exist: overburden pressures at target depths are too high to allow

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			target zone; and natural conduits for flow from the target zone should not exist." There is no supporting evidence for this statement provided in the EA. In addition, Plume (2009) indicates that the hydraulic properties of basin-fill deposits and volcanic rocks have not been evaluated in the upper Humboldt River basin, indicating that the presence of possible natural conduits is unknown. This same author also points out that faults and related fractures can function as either an enhanced conduit or an impediment for groundwater flow, depending on the circumstances and that the effects of faults may remain unknown until large- scale pumping stresses are applied to an aquifer. The EA needs to address the possibility of conduits being present and the environmental ramifications that could result.	them; and if they did exist, oil would have escaped so there would be no target. Rock pressure can be approximated as 1 psi per foot depth; at a 5,000 ft deep target no open void is possible; a fluid-filled void might exit but would have to be closed to prevent the fluid being expressed.
5	Special Status Species	U.S. Fish and Wildlife Service	The EA states that "BMPs for Fluid Management Developments proposed by the Sage-grouse National Technical Team (2011) include limiting noise to less than 10 dBA above ambient measures (18-26 dBA) at sunrise at the perimeter of a lek during lek season (Blickley et al., 2012)." The Service does not accept a threshold of 10 dBA above ambient baseline. Ambient noise levels are what the greater sage-grouse are habituated to, which based on the data provided in the EA, is a baseline of 18 dBA (the lowest value recorded). Noise above ambient levels may or may not result in disturbance, depending on what the greater sage- grouse will tolerate. That threshold has not been determined and will vary by individual and population (e.g.,	The BLM is using adaptive management practices based on Patricelli's work which establishes the interim standard of 10 dBA above ambient and the three mile buffer around leks. The Sage-grouse National Technical Team report recommends a four mile buffer, however the recommendations are in the process of being analyzed in the Nevada Northeastern California Greater Sage-Grouse EIS. The final EIS is scheduled to be released in Fall of

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			lek). For instance, leks within proximity to a high-use road, etc., are likely to be more tolerant of disturbance or at least certain types of disturbance (e.g., road noise). During the data collection effort, what were the conditions (e.g., distance, vegetation type, weather, etc.) when decibel readings were recorded? Was monitoring done to note changes in behavior of sage-grouse present (e.g., startling, flushing, etc.)?	2014. Negotiation between NDOW and BLM over the technical team's recommendations determined that a three mile buffer was sufficient for Nevada Sage-Grouse protections. Noise data was extrapolated from two noise surveys, an on-the-ground noise survey conducted specifically for sage grouse in the Mary's River project area which has similar environmental conditions as the Huntington Valley project area and a noise survey conducted at Huntington for the California Trail using the sage grouse protocols. A proposed mitigation measure includes an ongoing monitoring effort to monitor for potential changes in sage-grouse behavior.
6	Special Status Species	U.S. Fish and Wildlife Service	In this same section, the EA states "The measured noise was used to model noise from the same drilling rig on each of the proposed well pad locations to a distance where the noise would attenuate to 25 dBA at leks (Brennan, 2013b)." The Service recommends that modeling efforts be redone using the lowest value for the baseline of 18 dBA and not the highest of 25 dBA. Using the recommended 4-mile buffer, the percentage of each	The modeling data available was obtained from the Mary's River Area and that report utilized the 25 dBA attenuation reference level. To keep noise modeling consistent between the Marys Rivers and Huntington Valley projects, the noise modeling for the Huntington Valley project was extrapolated from this data.

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			lek, if any, that falls within the 4- mile buffer, should be calculated.	See the response to comment #5 for response to 4-mile buffer comment.
7	Special Status Species	U.S. Fish and Wildlife Service	The Service appreciates the additional analysis of habitat removal per lek due to project activities. However, cumulative impacts also need to be determined for each lek. The Service requests that a cumulative effects analysis for each lek be conducted that is limited to the area within 4 miles of each of the 4 active leks. The total acreage and the percent loss of both preliminary priority habitat (PPH) and preliminary general habitat (PGH) habitat on federal lands, as mapped by the BLM, and Habitat Categories 1, 2 and 3 on non-federal lands, as mapped by the Nevada Department of Wildlife, should be noted for each individual lek. Knick and his colleagues (2013) found that only a small increase in disturbance can result in a negative impact to a lek. As a result, the Service has concerns that the proposed project may result in one or more of the four active leks being abandoned.	A cumulative effects analysis was conducted for the three-mile buffer area for each lek. See the response to comment #5 for response to 4-mile buffer comment.
8	Fish and Wildlife	U.S. Fish and Wildlife Service	The EA states that "Construction of the Proposed Action could directly and/or indirectly affect aquatic species and habitats present in the Project Area by accidental release of diesel fuel, lubricants, and herbicides in aquatic habitats in the project area." This is the second mention of herbicide use in the EA. If herbicides are to be used, such use needs to be included in the proposed action in Chapter 2 and other relevant sections of the EA. A list of potential herbicides to be used and a discussion of potential	A discussion of herbicide use is included in the Huntington Valley Integrated Weed Management Plan (Appendix F) to the EA. The plan states that only BLM-approved herbicides would be used and that applicators must be experienced and certified by the Nevada Department of Agriculture. Appropriate Pesticide Application Records and Pesticide

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			effects as well as mitigation measures needs to be included as well.	Use Proposals would be completed for all areas to be treated, if required by the BLM. All applications would be under the supervision of a BLM licensed specialist.
Environmental Groups and Native American Tribes				
9	Policy and Process	Elko Band Council	I demand that the BLM extend the comment period to 60 days on the Huntington Valley Oil and Gas Exploration Project Environmental Assessment CEA)- DOI-BLM- E200-NV-2014-000 3-EA.	The comment period was extended from June 6th to June 24th – an additional 18 days.
10	Water Resources	Elko Band Council	It appears that the South Fork Band and other commentators expressed concerns regarding contamination to groundwater due to hydraulic fracturing and the Elko Band echoes those concerns.	Comment noted. Potential effects to groundwater resources as a result of hydraulic fracturing are discussed in Section 3.2.4.6, Environmental Effects – Groundwater, in the EA.
11	Socioeconomics	Elko Band Council	The Elko Band Environmental Department has concerns about the use of the 2013 Census data in Table 3.4-9. The Elko Band Council contends that the data in the 2013 Census is incorrect and we recommend that BLM or Noble Energy conduct their own poll to determine the data represented in Table 3.4-9.	Conducting a population survey is beyond the scope of the current analysis and outside the BLM's jurisdiction.
12	Water Resources	Elko Band Council	The EA refers to data from "all samples in this set." We presume from this that sampling for radioactive elements has occurred. Noble Energy should perform bi-annual tests that measure the radioactive constituents in the soil, surface water, and groundwater. Then they should follow-up with post project testing. There is a worry that the "fracking" process may bring up/out radioactive elements that find their way into the water table. It is of paramount	Table 3.2-21 in the EA contains three radiometric water analyses, namely radium, and alpha and beta radioactivity counts, to which all water samples would be subjected just as the baseline set was. Naturally occurring radioactive constituents at depth are either captured in drilling fluid during drilling or isolated from

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			importance to the residents in and near the project area that Nobel Gas and the regulatory agencies monitor this data and that they be held accountable if this project contaminates the environment with radioactive material that otherwise would have not been introduced into the soil and water table if not for the Huntington Valley Oil and Gas Exploration Project.	the surface and aquifers by the same measures (casing and grouting) as described in the EA (e.g. Section 2.2.1.1.2). Radioactive constituents do not have any escape pathways different from other water-born constituents.
13	Cultural Resources	South Fork Band Council	The South Fork Band requests vigilant stewardship on your behalf regarding their sincere interest in the preservation of cultural, religious, and historic artifacts that may be encountered during the activities of Noble.	Comment noted.
14	Cultural Resources Vegetation	South Fork Band Council	The ethnobotanical nature of some native plants utilized by aboriginal people within the area, are a concern to the South Fork Band as Western Shoshone People and every effort should be made to preserve their existence.	Comment noted
15	Special Status Species	Wild Earth Guardians	We are concerned that BLM did not take the requisite 'hard look' at direct and cumulative impacts to the project on sage grouse in the Huntington Valley EA. We are also concerned that the proposed project will have significant impacts on sage grouse and their habitat, rendering it necessary to complete a full-scale EIS prior to approving the project. Overall, BLM should defer approval of this project until the California-Nevada Greater Sage-grouse RMP Amendment is completed, and apply all protections contained in the Plan Amendment to the Huntington Valley project.	Direct effects to greater sage-grouse are discussed in Section 3.3.4 in the EA. Cumulative effects to greater sage-grouse are discussed in Section 3.3.4.3 in the EA. The BLM has not found significant impacts through the analysis completed in the EA. The BLM doesn't need to complete an EIS if no significant impacts are identified or found in the EA.

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				NEPA regulations state that during the preparation of a planning-level NEPA document, the Responsible Official may undertake any major Federal action in accordance with 40 CFR 1506.1 when that action is within the scope of, and analyzed in, an existing NEPA document supporting the current plan or program, so long as there is adequate NEPA documentations to support the individual action. The BLM NEPA manual allows for actions to take place as long as they do not limited the choice of alternatives being analyzed in the RMP revision and if that action is already proposed for implementation in an existing land use plan. All alternatives are in conformance with the existing RMP (Section 1.3 of the EA).
16	Special Status Species	Wild Earth Guardians	BLM must consider implementing key sage grouse protections recommended by USFWS and the BLM's own National Technical Team (e.g., a 4-mile no surface disturbance buffer as a Condition of Approval on current fluid mineral leases for active leks within Priority Habitats, apparently not considered in any alternative). Importantly, according to BLM, "The National Policy Team created the NTT in August of 2011 specifically to develop conservation measures based on the best	See response to comment 5. BLM is in conformance with IM 2012-043, Greater Sage-Grouse Interim Management Policies and Procedures.

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			available science." Wyoming Greater Sage-grouse RMP Amendment DEIS at 1-7.	
17	Special Status Species	Wild Earth Guardians	BLM must evaluate the effectiveness of the conservation measures used to minimize adverse impacts to wildlife and sensitive species with the best available science.	The Mitigation and Monitoring Measures provided in Section 3.3.4.2 in the EA include requirements for ongoing sage-grouse monitoring for lek attendance, habitat evaluation, and noise monitoring in addition to a collaring effort to monitor hen movements. The measures also include establishment of a wildlife working group to apply adaptive management techniques by evaluating monitoring data, adjusting protocols, and responding to impacts that have been documented.
18	Special Status Species	Wild Earth Guardians	The BLM must make up for the absence of population status and trend data for BLM Sensitive Species (i.e., greater sage grouse) by generating these data of its own accord where they are unavailable through Wyoming state agencies or other external sources.	BLM consulted with the Nevada Department of Wildlife on population and trend data which was incorporated into the analysis. BLM does not generate population data.
19	Special Status Species	Wild Earth Guardians	We expect BLM to respond substantively to each issue raised in these comments pursuant to the requirements of NEPA.	Comment noted.
20	Special Status Species	Wild Earth Guardians	We are concerned that approval of this project in a manner that results in significant impacts to greater sage- grouse or their habitats also constitutes undue degradation to these resources, regardless of how	Leases which have been in place for 5 to 10 years established this project as a nondiscretionary action. In addition to the BMPs and applicant

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			necessary or unnecessary the impacts. Continued application of stipulations known to be ineffective in the face of strong evidence that they do not work, and continuing to drive the sage grouse toward ESA listing in violation of BLM Sensitive Species policy, is arbitrary and capricious and an abuse of discretion under the Administrative Procedures Act. The agency, through its handling of the Huntington Valley project, needs to provide management that will prevent this decline of sage grouse across the project area.	committed measures, BLM stipulated additional adaptive management measures. See response to comment #17, above.
21	Special Status Species	Wild Earth Guardians	Among other commitments, this policy binds the BLM to "use the best available science and other relevant information to develop conservation efforts for sage-grouse and sagebrush habitats." With this in mind, we ask the BLM to gather each of the scientific articles referenced in the Literature Cited section of these comments, review them thoroughly and incorporate their findings into the EA, and add them to the administrative record for this project.	Comment noted. BLM used the best available data gathered by internal and external sources to sufficiently analyze sage-grouse resources and impacts to those resources.
22	Special Status Species	Wild Earth Guardians	According to BLM IM 2012-44, "The conservation measures developed by the NTT and contained in Attachment 3 must be considered and analyzed, as appropriate, through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-Grouse habitat." IM 2012-44 does not provide an option not to analyze these measures in at least one alternative unless a clear finding is provided that the measure is not appropriate, and BLM has provided no such findings.	IM 2012-043 covers interim management policies and procedures. We believe that the BLM is in compliance with guidance. IM 2102-044 covers land use planning. BLM is working on the Nevada and Northeastern California Greater Sage-Grouse EIS to amend existing land use plans and resource management plans. IM 2012-044 is not directly applicable to this EA.

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23	Special Status Species	Wild Earth Guardians	In the context of the land use planning process, each State Director is responsible for "[e]nsuring that when BLM engages in the planning process, land use plans and subsequent implementation- level plans identify appropriate outcomes, strategies, restoration opportunities, use restrictions, and management actions necessary to conserve and/or recover listed species, as well as provisions for the conservation of Bureau sensitive species." BLM Manual 6840.04(D)(5). BLM is working toward this goal in the California-Nevada RMP Amendment, and we urge BLM not to undermine its own planning process by approving this project, which appears to be at cross-purposes with the Plan Amendment, in the interim.	See response to Comment #15, above.
24	Special Status Species	Wild Earth Guardians	We are concerned that none of the action alternatives for this project will uphold BLM's obligation to manage Sensitive Species to "minimize or eliminate threats," either within or outside of Core Area habitats. As detailed elsewhere in these comments, even considering mitigation measures applied under Appendix I and in the body of the EA, this project will inevitably lead to serious impacts to sage grouse populations, particularly in General Habitats. This result represents an unnecessary and undue degradation of key sage grouse habitats.	See response to Comment #17, above.
25	Special Status Species	Wild Earth Guardians	This Project May Result in Significant Impacts to Sage Grouse and their Habitats Both Preliminary Priority Habitat and Preliminary	BLM is in conformance with IM 2012-043, Greater Sage-Grouse Interim Management Policies and Procedures.

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			General Habitat are present in the project area: BLM's classification of greater sage-grouse habitats in the Project Area is limited to federal land. The BLM (2012b) has classified PPH and PGH in the Project Area on public lands. EA at 137. Further, BLM PPH (also NDOW Habitat Category 1 and 2) coincides with 12,208.0 acres or 19 percent of the Project Area. BLM PGH (also NDOW Habitat Category 3) coincides with 20,747.4 acres or 33 percent of the Project Area. EA at 138. Many of the proposed wellsites are located in Preliminary General Habitat (see Figure 3.3-4), indicating that significant impacts to sage grouse are likely in these areas. BLM itself notes that sage grouse chick production per hen in this Population Management Unit is already below the 2.25 threshold identified as the minimum required to maintain stable populations (EA at 143), meaning that any additional losses in productivity as a result of the project are properly seen as a serious threat to population viability. BLM states, For this Project, leks were monitored within a 3---mile lek buffer that intersected the Project Area	NEPA regulations state that during the preparation of a planning-level NEPA document, the Responsible Official may undertake any major Federal action in accordance with 40 CFR 1506.1 when that action is within the scope of, and analyzed in, an existing NEPA document supporting the current plan or program, so long as there is adequate NEPA documentations to support the individual action. The BLM NEPA manual allows for actions to take place as long as they do not limited the choice of alternatives being analyzed in the RMP revision and if that action is already proposed for implementation in an existing land use plan. All alternatives are in conformance with the existing RMP (Section 1.3 of the EA). See response to comment #5 and #15.

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			boundary. The 3---mile lek buffer was the standard to date for a protective buffer (Sage---grouse National Technical Team, 2011). A 4---mile buffer, while recommended by the National Technical Team, was not the standard at the time the surveys were completed. EA at 37. This is a puzzling statement, as the BLM references the National Technical Team report as setting the 3-mile standard for surveying for sage grouse habitat. It does not – as BLM concedes, the National Technical Team recommended a 4-mile buffer as the appropriate distance, in 2011 (well before this EA published). NEPA requires BLM to consider significant new information unavailable at the time that previous NEPA analyses (in this case, the applicable Resource Management Plan EIS) were conducted. Subsequent analysis in the EA appears to have used a 4-mile buffer.	
26	Special Status Species	Wild Earth Guardians	While no proposed wellsite appear to be within a 3-mile buffer of active sage grouse leks, a number of wellsites appear to be within a 4-mile buffer. See Figure 3.3-3. These include site J29C, J29L, J28M, JS1I, J32G, J33J, J3O, J3F, J14D, J8E, J8M, K2B, K1E, K2J, K1L, and K1P. Id. To the extent that these wellpads are located within important sage grouse nesting habitats (all except K2B, K2J and K1E, Figure 3.3-3), these locations for wellsites are likely to have significant impacts on nesting and early brood-rearing sage grouse during the production phase of each well's life cycle. In	See response to Comment #17, above.

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			addition, wellsites G18C, G18J, G17E, G17P, G20C, G20L, G21F, and G21M are also mapped as occurring within identified sage grouse nesting habitats. Figure 3.3-3. Location of wells in these areas also have the potential for significant impacts.	
27	Special Status Species	Wild Earth Guardians	Wintering habitats are also critically important for the survival and recovery of greater sage-grouse populations. All proposed wellsites except wellsites in the "K" series are located in identified sage grouse wintering habitats. See Figure 3.3-3. All wellsites located within identified wintering habitats would be expected to have significant impacts on wintering birds as a result of disturbance and displacement due to vehicle traffic and human activity on the wellsites throughout the production phase of the wellsites' life cycle.	See response to Comment #17 and #20, above.
28	Special Status Species	Wild Earth Guardians	BLM's mitigation for this disturbance appears to focus exclusively on noise levels exceeding sage grouse tolerance thresholds. EA at 153-154. However, drilling operations include other potentially significant impacts on sage grouse, including radically increased truck traffic (regardless of time of day when that traffic occurs), radically increased human activity on the wellsite, and the introduction of a tall structure that is likely to displace grouse from nearby habitats. Each of these is potentially significant impact to sage grouse and their habitats, particularly nesting and brood-rearing sage grouse and sage grouse using wintering habitats. The only way that these temporary but potentially significant impacts can be averted is to	There are applicant committed mitigation measures to reduce impacts from increased traffic, increased human activity, and the introduction of tall structures. There is a mitigation measure that would allow for modification of Application for Permit to Drill (APD) during the pre-drill onsite meeting to add site specific protection measures for all wildlife species. The proposed mitigation and monitoring measures allows additional protections not identified in the proposed action.

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			impose a moratorium on drilling and construction activities inside identified seasonal habitats during their season of active use by grouse. Doing so would potentially reduce the impacts of construction and drilling below the significance threshold, and BLM would also need to reduce the impacts of habitat fragmentation and disturbance throughout the production phase of the project as outlined below.	
29	Special Status Species	Wild Earth Guardians	The National Technical Team (2011) determined based on an analysis of the best available science that one well pad per square mile section was the maximum recommended density of wellsites within Priority Habitats. Well densities greater than this threshold would be expected to have a significant negative impact on sage grouse, particularly when they are sited within 4 miles of active leks, within identified nesting or brood-rearing habitats, or within identified wintering areas. Wellsites exceeding this density threshold have been proposed for this project within such sensitive habitats. See Figure 3.3-3.	BLM includes the following mitigation measure in the EA (see section 3.3.4.2): "To consolidate disturbance, pad density shall be maintained into the smallest area practical to maintain viable and safe operations. Pads shall be located to one concentration area per square mile. The initial two well pads were placed to meet the consolidation criteria; if/or when additional well pads are submitted for construction, they shall be located at a minimum 1 mile from the two initial well pads. The new well pads shall be consolidated into as small an area as possible and outside the square mile of influence of any other concentration area. This format shall be followed throughout the continued development of the project."

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				BLM also includes a measure for establishment of a wildlife working group to apply adaptive management techniques by evaluating monitoring data, adjusting protocols, and responding to impacts that have been documented.
30	Special Status Species	Wild Earth Guardians	It is critically important to maintain large leks, rather than allowing impacts from energy development to degrade them into small leks. BLM has not disclosed populations of potentially affected leks, nor which of these might be classified as large leks, representing NEPA hard look and baseline information deficiencies. When large leks are lost and only small leks remain, extirpation via West Nile virus, fire, or other stochastic disturbances (notably in Nevada, fire) becomes likely, perhaps only a matter of time.	This data is identified on Table 3.3-9 and large leks are not identified as such by NDOW classification.
31	Special Status Species	Wild Earth Guardians	It appears that the "concentration area" approach proposed for implementation in the project (EA at 153) will still exceed the one wellpad per square mile threshold as noted above, and thus result in significant impacts to sage grouse based on wellpad density.	See response to Comment #29, above.
32	Special Status Species	Wild Earth Guardians	BLM's Best Management Practices erroneously assumes that Noble must use vertical wells for exploration. See Appendix I. In fact, Noble can also use S-turn directional wells, which effectively represent a vertical wellbore when they reach and traverse the target formation(s). See Attachment 10. Horizontal displacement can be achieved through	The proposed action is for drilling up to 20 wells; no more than 4 would be horizontal. The mitigation though not requiring one pad per square mile is requiring that all pads be concentrated in a single area in each square mile. Thereby consolidating

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			off-setting the wellbore from vertical above the target formation, allowing multiple exploratory wells to be clustered on a single pad. BLM should consider at least one alternative that requires that no more than one wellpad per square-mile section; S-turn directional drilling afford the technological capability that makes this approach not only possible, but reasonable.	impacts to a specific area per square mile where additional mitigation, BMPS's, and applicant committed mitigation may be applied (See comment #29).
33	Special Status Species	Wild Earth Guardians	We are concerned that the amount of surface disturbance, as well as road density, in parts of the project area may already exceed the 3% disturbance threshold, and the approval of the project could further increase the proportion of habitat subjected to surface disturbance in some parts of the project area, while in others habitats currently below the 3% threshold will be pushed above the 3% threshold, resulting in further significant impacts to sage grouse. This is particularly true in the northern end of the Project Area where "J-series" wells are proposed in habitats that are both nesting and wintering habitats for sage grouse. See Figure 3.3-3.	See Table 3.3-12 in the EA which shows that the 3 percent disturbance threshold would not be exceeded in the South Fork PMU nor at any of the known leks coinciding with the project area.
34	Special Status Species	Wild Earth Guardians	BLM needs to conduct an analysis for the project area to see which square-mile sections currently comply with or exceed the 3% disturbance threshold as a matter of baseline information necessary for the NEPA analysis, and which square-mile sections will be push over this threshold (or will be further elevated above this threshold for sections that already exceed it) in order to adequately take the legally required "hard look" at impacts under NEPA. In all sections where the 3% threshold is already or	Table 3.3-12 identifies the percentages of cumulative effects area (PMU) and per lek. The criteria for determining the 3% is of one or two ways. The first is for the entire critical use area (PMU) or, (2) by habitat of contiguous use (nesting, brood rearing, wintering habitat). The PMU that was analyzed is separated by non-habitat (Lamoille

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			would be exceeded and additional wellsites, roads and/or pipelines are proposed, significant impacts would occur as a result of the project, requiring a full-scale EIS.	Highway/Spring Creek urbanized area), so the entire critical use area was not utilized but habitat of contiguous use in the appropriate portion of the critical use area was utilized.
35	Special Status Species	Wild Earth Guardians	BLM's current analysis examines only percent disturbance on the PMU level and based on individual leks (EA at 148). Further analysis on a per-square-mile-section basis is required to meet NEPA's "hard look" requirements and ensure that significant impacts to sage grouse and their habitats will not occur.	See response to Comment #34, above.
36	Special Status Species	Wild Earth Guardians	BLM's analysis on this scale indicates, "As proposed, well pad density would exceed these thresholds at some locations." EA at 148. This is a significant impact triggering a fill-scale EIS before such impact levels could be legally approved.	The first two proposed well pads would be arranged in concentrated areas within one square mile and subsequent well pads would be required to be located a minimum of one mile from the initial concentration of well pads. Future development practices would be determined in the future based on data gathered through monitoring efforts including noise and collaring.
37	Special Status Species	Wild Earth Guardians	BLM goes to great lengths in the EA to provide a credible assessment of noise thresholds for sage grouse and the levels at which serious impacts occur. See EA at 149, 150.	Comment noted.
38	Special Status Species	Wild Earth Guardians	The agency then emplaces Best Management Practices at odds with these scientific recommendations:	Mitigation and monitoring requirements of additional noise

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			As practicable, limit noise sources to 50 dBA or 10 of above ambient noise levels which ever is higher measured at the perimeter of a three mile radius buffer around an occupied lek from March 1 to May 15 (Inglefinger 2001, Nicholoff 2003). See Appendix I at 2, emphasis added. No scientific study has ever found that 50 dBA is a level of noise that will prevent significant impacts to sage grouse; indeed the opposite is the case.	surveys is identified to determine the correct noise dBA thresholds during the phases of exploration activities. Additional mitigation measure is identified to modify exploration activities on the ground in the event impacts are determined to be occurring.
39	Special Status Species	Wild Earth Guardians	The Preferred Alternative would require that noise be limited to 50 dBA or 10 dbA above ambient noise levels, whichever is greater, within 3 mile of active leks, and fails to appropriately define ambient noise levels. We are concerned that under these provisions, BLM will inappropriately include currently existing human-caused noise sources in the ambient noise level, allowing additional noise to be permitted far above the 30-32 dbA absolute threshold recommended by Patricelli et al. (2012), and indeed preventing noise restrictions from kicking in unless and until they exceed 50 dBA. This will inevitably result in significant impacts to sage grouse populations in the project area and beyond. We recommend that noise limits be imposed for the project, allowing no greater than 32 dBA noise levels in sage grouse nesting and breeding habitats.	Ambient noise level has been determined to be 18-27 dBA. BLM will adhere to the 10 dBA (up to 37 dBA) to intiate modification to exploration activities (See comment #5).
40	Special Status Species	Wild Earth Guardians	Holloran (2005) found that the location of roads within 1.9 miles of lek sites had a significant negative impact on sage grouse breeding activity.	No proposed roads are within 3 miles of any lek and all proposed roads within nesting and brood rearing

Comment Number	Category	Organization	Comment Text	BLM Response
			We are also concerned that roads (and associated traffic, dust, and noise) has the potential to significantly impact nesting sage grouse and their habitats, disturbing and/or displacing birds during this crucially important part of their life cycle. Please analyze how much of the Project Area is beyond 1.9 miles from an improved gravel road, both before and after the project, and how this affects known breeding and wintering habitats, and General Habitat as a whole.	habitats were analysed in the EA and there is a monitoring measure to determine fragmentation impacts of all project components. Results of this monitoring will allow form modification in exploration activities if necessary.
41	Special Status Species	Wild Earth Guardians	While we support the concept of phased exploration with concurrent reclamation, BLM proposes an 'adaptive management' approach to prevent significant impacts to sage grouse, an approach destined to fail due to the known inability of monitoring to detect sage grouse population changes until years after habitat impacts have already taken place.	BLM is using methods that have proven effective for other past minerals projects on the Elko District and there is a mitigation measure that will monitor population changes through the life of the project (ie. collaring hens).
42	Special Status Species	Wild Earth Guardians	EA at 39. There is a tendency for sage grouse to return to habitats degraded by human developments even when using these habitats reduces survival or reproductive success, and for this reason population declines often lag 2 to 10 years behind the act of habitat destruction (Holloran 2005, Walker et al. 2007, Attachment 17, Harju et al. 2010, Attachment 18). Because population responses to degrading habitat will not trigger adaptive responses until years after the habitat impacts that cause significant declines will have occurred, it is improper to rely on an adaptive management approach. By the time the BLM's Wildlife Working Group notices that	BLM is using methods that have proven effective for other past minerals projects on the Elko District and there is a mitigation measure that will monitor population changes through the life of the project (ie. collaring hens).

Comment Number	Category	Organization	Comment Text	BLM Response
			population declines are ties to the project, it will have already continued down that destructive path without corrective action for years.	
43	Special Status Species	Wild Earth Guardians	We are concerned that The Huntington Valley EA has failed to adequately assess the cumulative impacts of the project and previous and reasonably foreseeable human disturbances on sage grouse. Specifically, BLM notes that 30% of the sagebrush habitat has already been disturbed by wildfire or vegetation treatment projects. EA at 155. To what extent have important habitat thresholds already been crossed, rendering any additional human impacts significant (and potentially catastrophic) for sage grouse and their habitats?	BLM is using best available information from NDOW on sage-grouse habitat viability in the project area. Project monitoring will give important additional data to predict future population changes.
44	Special Status Species	Wild Earth Guardians	BLM notes that Interstate 80 crosses through the cumulative effects area for the project (EA at 155), but does not appropriately assess its impacts. Connelly et al. (2004; as this electronic file is too large to attach to these comments, please download Attachment 19 at http://sagemap.wr.usgs.gov/conservation_assessment.htm) documented a negative affect on Interstate 80 (I-80) in southern Wyoming.	Map 3.1-6 shows Interstate 80 is the northern CESA boundary.
45	Special Status Species	Wild Earth Guardians	BLM needs to re-run its cumulative impacts analysis in light of the wide buffer of disturbance that Interstate 80 and other highways have on sage grouse habitats, which extends far beyond the immediate surface acreage of the highway itself as calculated in the Huntington Valley EA's cumulative effects analysis.	Map 3.1-6 shows Interstate 80 is the northern CESA boundary. All other roads within the CESA were analyzed in the EA.
46	Special Status	Wild Earth Guardians	BLM notes that livestock grazing has negative	Residual cover, or stubble height,

Comment Number	Category	Organization	Comment Text	BLM Response
	Species		effects on sage grouse, and should be considered in the cumulative effects analysis. EA at 156. Connelly et al. (2000, Attachment 21) recommended maintaining a 7-inch stubble height for grasses between sagebrush throughout the nesting and brood-rearing seasons. This finding was empirically confirmed by Hagen et al. (2007, Attachment 22). This residual grass is critically important to provide grouse hiding cover from predators, particularly avian predators, during the vulnerable seasons when hens are on the nest or accompanied by small chicks. To what extent do grass heights meet this threshold throughout the Project Area? This is a critically important consideration, absent from the EA (see EA at 121), because the introduction of habitat fragmentation, structures used as perches, and human activity associated with oil and gas development can increase and/or concentrate avian predator effects on sage grouse (Bui et al. 2010, Attachment 23).	was not identified as an issue for Greater Sage-Grouse during the external and internal scoping or through the alternative and cumulative effect analysis. So residual cover was not addressed in the EA. The BLM determined that well placement, access road locations, and drilling/fracturing operation effects have more of a potential impact on Greater Sage-Grouse.
47	Special Status Species	Wild Earth Guardians	The cumulative effects analysis fails to examine this synergy between cover reduction by livestock and increased avian predator activity as a result of oil and gas development, a potentially significant cumulative impact on sage grouse populations.	See Response to #46
48	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water	Thank you for your circulation of this important Environmental Assessment (EA). We have reviewed the Project, the EA, and various background materials and satellite images, and based on our review we recommend that an	EA analyzes the drilling of up to 20 oil wells and production for 20 years. Analysis documented that no significant impacts would occur from

Comment Number	Category	Organization	Comment Text	BLM Response
		and Fracking, Oil and Gas Committees	Environmental Impact Statement (EIS) be prepared for the entire, 20-25 year oil and gas development program rather than segmenting various parts in EAs. Our general comments can be summarized along the following: The Project is segmented and thereby incomplete and inadequately defined, assessed, and mitigated; Project Description is inconsistent incomplete, and inadequate. References are made to documents studies, and activities not available to, subject to review of, or vetted by the public; Exhibits, Appendices, and other available documents are inconsistently referenced; EA indicates adequate effects and mitigation measures to warrant preparation of an EIS for this important project; We therefore request that a complete, thorough, and edited EIS be prepared for the entire period of the Project's activities from exploration through abandonment and reclamation.	the proposed action so an EIS is not required. If exploration activities discover additional resources, impacts from future expansions proposals would be analyzed in a subsequent EIS.
49	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	As the purpose of the EA is to provide assistance in the determination as to whether an EIS is required, the following comments support the BLM Nev's decision to conduct an adequate and complete and fully documented/edited EIS. We thereby request that the BLM Nevada, Elko Office prepare a full, adequate, and complete EIS for the Huntington Valley Oil and Gas Project. If BLM fail to prepare an EIS and responses to the attached we request a	Comment noted.

Comment Number	Category	Organization	Comment Text	BLM Response
			formal statement delivered to me in a timely manner along with period/deadline for submitting formal appeals to the determination in accordance with NEPA and the Federal Land Policy and Management Act.	
50	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	p.1/par.1 Noble Energy, Inc. (Noble),a Master Surface Use Plan of Operations (MSUPO)...Huntington Valley Oil and Gas Exploration Project. The Project appears to be limited or segmented to only the first 20 of 39-800 wells without assessment and mitigation for the entire program and its field(s) abandonment(s). EIS must be required for addressing all aspect of a maximum field(s) development. Appendix E Fig. 3 shows 22 well head/site/tops on a typical drilling setup for walking rig while other figures show 2-14 wells, not just one well per pad. Descriptions of the 39 drill pads shows a "walking rig" setup, suitable for moving through 22 well heads in three clusters of 8+6+8 wells and are often called "Multi-Well Pads" or perhaps "Multi-Octopus Well Pads". Total well program may be 39 x 22 = 858 or 20 x 22 = 440 wells. An accessible field for such pads could be effectively 160,000-310,000 acres (=8000ac/pad x 20/39).	The EA states that "The Proposed Action is for a maximum of 20 wells on 20 well pads…" Any decision for this project would not authorize more than 20 wells on 20 well pads. See response to Comment #48, above.

Comment Number	Category	Organization	Comment Text	BLM Response
			As the EA has not completely described the project, well pads, and wells, the EA must be considered as incomplete and inadequate and an EIS must be required for addressing all aspect of a maximum field(s) development.	
51	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Appendix/Exhibit E Fig.s 3-5+9 Typical and Winterized Wellsite/Rigsite Layout - Pad Location & Production Pad Typical/Location of Production Facilities Fig.s 3 and 9 in Appendix/Exhibit E indicate 14-22 well heads to be drill for each pad; current technologies used elsewhere in Texas, Dakota, and Colorado, while the production facilities in Fig.s 4-5 show only two producing wells (identical to positions on Fig.3); 10-15% success ratio seems unusually low and is assumed to be an error or attempt to distort to the low side the numbers of operating wells for each pad: total of 40 - 78 wells rather than 440-800+. All drawings and text descriptions of the Project must be vetted and edited to provide a clear and consistent Project Description; the EA Project Description is confused and inconsistent. The EIS must provide complete and consistent project describers for the maximum project development. Projects must be assumed to be fully	The EA states that "The Proposed Action is for a maximum of 20 wells on 20 well pads…" Any decision for this project would not authorize more than 20 wells on 20 well pads. See response to Comment #48, above.

Comment Number	Category	Organization	Comment Text	BLM Response
			successful or be subject to claims of segmentation/piecemealing.	
52	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Appendix/Exhibit E Fig.s 3-5+9 Typical and Winterized Wellsite/Rigsite Layout - Pad Location & Production Pad Typical/Location of Production Facilities Fig.s 6-7 Well Schematics are in error and not consistent in figures and text. Fig.s 6-7 Fourth layer is penetrated by the Intermediate Casing and is stated to be spudded in the top of the "hydrocarbon bearing zones below" (=Uppermost HC Zone, UHZ). Production casing is then shown passing below the UHZ and only cemented from the bottom of Layer 4 and through Layer 5, although it is supposed to be cemented 500 ft above the UHZ. Then the Fifth layer is both cemented and stimulated with tubing placed and anchored in the cemented section for "long-term" production.	These drawings are "typical drawings" – and are not meant to be specific. Applications for Permit to Drill (APDs) will provide site specific information. A signed Decision Record for the EA does not approve individual well pads – that is done at the APD level.
53	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Fig.7 shows a "typical" casing schematic section with a steel tubing (called casing) and casings with downhole separated oil/gas/water. Casings are referenced only to the conductor which does not go into the aquifer levels, surface, intermediate, and production along with tubing (usually NOT STEEL) inside the production casing. As the figures are in error, the EIS must contain accurate and verified drawings of typical sections and drawings, not these.	See response to comment #52

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54	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Fig.8 Drilling Plan (To Be Provided) Not provided in EA, but was provided in exhibit for public presentation and thereby reviewed based on that document rather than the absent Appendix referenced in the EA. Noble Energy Presentation of Dec. 3, 2013 Open House - DP DP 3/1/Item3 The Huntington Area wells...drilled either vertically or directionally with an 'S' shaped profile, alone or in pairs...for micro-seismic listening purposes during...hydraulic stimulation. Confused description for microseismicity wells or ALL wells. Similarly, EA text refers to a few horizontal wells and implied rest are "typical" vertical wells, rather than slant or directional.	See response to comment #52
55	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	3/1/Item 4 Potential reservoirs of the Humboldt, Indian Well and Elko formations will be evaluated with wireline logs and potentially sidewall cores and formation tests will be taken. This is the only indication in EA (or its reference documents) that shallowest formation is considered as a "reservoir" and thereby could be subject to fracking and would generally be protected only by the surface and intermediate casings. Risks of contamination have not been assessed in EA.	Risks of contamination were analyzed for surface water on page 95 and for ground water on page 112.
56	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water	DP 3/2/Item 5+8 Drill 12-1/4" hole to □ 3500' TVD / 3500'MD using water based, inhibitive gel mud system. Drill 8-3/4" hole to 11,500'...collecting geoscience data...at first 8.75" bit trip.	As described in section 2.2.1.1.2, page 21, drilling would be performed with circulation of an inert bentonite water-based mud, with various

Comment Number	Category	Organization	Comment Text	BLM Response
		and Fracking, Oil and Gas Committees	For drilling beneath the 3500' level, the Plan does not describe the type and chemical composition of the drilling mud and therefore must be assumed to be oil based. No description of the transition from water- to presumed oil-based drilling muds are provided both for downhole and surface related equipment and facilities, again inadequate and incomplete avoidance of issues with potentially serious environmental effects.	viscosity and density-adjusters such as polymers and barite.
57	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	DP 5/4 In addition, the pipe and blind rams...Engineer and...Program Manager at the NV Division of Minerals will be notified at least twenty-four (72) hours...all BOPE pressure tests. As an indicator of vetting/editing or its absence. Entire "Plan" requires review and revision by a competent specialist and editor. Some parts avoid/confuse the tubing and production casings without clear presentation of a simple design schematic and consistent usage.	See response to comment #52
58	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Many acronyms are used without definition (single acronym/definition section is required) which prohibits reasonable public review.	A list of abbreviations and acronyms is provided in the Table of Contents.
59	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for	DP 7/1 Two part Production Casing is indicated herein but not in other drawings with a 200ft overlap but	See response to comment #52

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		a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	without clear description of cementing and securing of the overlap.	
60	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	DP 8/3+9/2+9/4 A Cement Bond Log (CBL) will be run throughout the full length of the...casing. Bumping and pressure tests are referenced elsewhere inconsistently and are commonly practiced rather than the more expensive CBLs. Please clarify and revise appropriately.	See response to comment #52
61	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	DP 9/1 Actual volume...based on TOC a minimum of 500' above shallowest productive interval. Productive or Uppermost Hydrocarbon-Bearing Zone or Interval are both used in the descriptions but are not defined and can be very different, the former being more limited and cheaper than the former.	See response to comment #52
62	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	DP 10/1 Mud Program: The drilling fluids have been designed for optimal wellbore hydraulics and hole stability...to maintain mud properties, control lost circulation and maintain well... Only water based muds are mentioned elsewhere in the Plan and EA while at depth oil-based muds must be presumed unless specifically excluded. Such muds must be clearly distinguished in EIS.	See response to comments #52 and 56.
63	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for	DP 10/1 ...control will be available at the well during drilling operations. No abnormal pressures have been noted or reported in wells drilled in this	See response to comment #52

Comment Number	Category	Organization	Comment Text	BLM Response
		a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	area. This statement is made without any reference to supporting documents and proximity to the referenced "wells" or "in this area".	
64	Proposed Action Air Quality	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	DP 13/3 7 Abnormal Conditions No abnormal temperatures or pressures are anticipated. No hydrogen sulfide has been encountered or is known to exist from previous drilling in the area. As a precautionary measure, H2S will be monitored and safety equipment will be on location per Operator's company policy to ensure the safety of the drilling operation. This statement is made without any reference to supporting documents and dimensioned proximity to the referenced "wells" or "in this area", again inadequate and incomplete avoidance of issues with potentially serious environmental effects. As indicated elsewhere, Well Drawing have indicated needs for both Methane and VOC flares without evidence of such needs and mitigation. Similarly without accessible supporting references, the absence-anticipation is unwarranted here, and H2S must be assumed and mitigation provided as in the case of VOC/NGL flaring.	See response to comment #52. H2S monitoring plan will be included as part of the APD, however H2S is rare in Nevada (Schmidt, 2014).
65	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for	DP 12/1 8 Wellbore Diagram Although the table and schematic are the most	See response to comment #52

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		a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	informative, the description does not appear to be consistent with those of the EA/Appendices and the other drawings and descriptions. The Intermediate and upper production casings and cements are reported elsewhere to overlap across the Uppermost or Shallowest Hydrocarbon Zone/Interval but here they don't.	
66	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	EA - Appendix D Narrative of Completion and Hydraulic Fracturing Linked Web page - Appendix D-Narrative of Completion and Stimulation and linked document Noble Energy Presentation of Dec. 3, 2013 Open House Exhibits Narrative of Completion and Stimulation Inconsistent references to same document causes confusion and may reflect inadequate editing and perhaps editing to remove sensitive issues from public review. Although stimulation does include fracturing or Fracking or Fracing, stimulation discussions were are focused entirely on fracturing rather than including a more practical stimulation of acidizing, acid fracking, gravel packing or frac-packing. An EIS is required and must include or specifically prohibit the various types of conventional and unconventional stimulation, development, or completion methods, especially those using pressures of >0.6psi/foot depth or any surface	The EA did not document significant impacts therefore an EIS is not required. Noble proposed hydrofracturing. They did not propose other stimulation methods. Noble will post chemical constituents on fracfocus.com.

Comment Number	Category	Organization	Comment Text	BLM Response
			pumps with capacities of >1000psig/400gpm.	
67	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Noble Energy Presentation of Dec. 3, 2013 Open House provided Exhibit E Fire Prevention Plan Measures and Exhibit K Field-Wide Stormwater Pollution Prevention Plan EA references Appendix K for Fire Prevention Measures but gives Exhibit K Field-Wide Stormwater Pollution Prevention Plan Both sets of documents must be compared and revised and included in the EIS.	The appendices are included in the EA – the Exhibits are included in Noble Master Surface Use Plan. These are two separate documents.
68	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	The Proposed Action is for a maximum of 20 wells on up to 20 well pads including construction, drilling, completion, production/operation, and abandonment. Noble has identified 39 potential well pad locations within the Project Area; however, no more than 20 well pad locations would be constructed periodically over 2 years with a maximum of 5 years. Statement appears to allow up to 22 wells from each of the 20 well pads. Therefore the field with 39 pads and up to 22 wells per pad could have a field of 440-858 wells covering at least 15,000ft radius from each pad. Pads appear to be set up for multi-well drilling from each pad, perhaps with a walking rig and multi-fracking setups.	Any decision for this project would not authorize more than 20 wells on 20 well pads.

Comment Number	Category	Organization	Comment Text	BLM Response
			The Project Description must be based on successful implementation of the total project - Huntington Valley Field. As currently stated, the maximum field size with maximum well count and maximum subsurface coverage have not been estimated. The Project Description must be provided wells, pads, and coverage with assumed successful undertaking and maximum development in order to avoid reviews based on the proposed project being an initial segmented portion of a much larger cumulative project, requiring additional minor categorical exemptions along the way. The Project Description must be revised and documented for the maximum successful development. Along with the Description revision, a thorough and complete project setting must be developed for the maximum surface and subsurface coverage, including current and required subsurface property lease holds and boundaries.	
69	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	1/1 ...2013, Noble conducted a 3D Seismic program within the Huntington Valley Project Area. Noble would use...previous 2D geothermal seismic programs, and previous well results from the Project Area to select locations that minimize the likelihood of encountering drilling hazards and increase the understanding of faults which may act as a conduit for fluids in the reservoir. All supporting studies and their presumed reports	Results of seismic studies conducted by private entities are proprietary and not available for public review.

Comment Number	Category	Organization	Comment Text	BLM Response
			are not accessible to the public and are not included in the EA or other available documents. Any such documents must be included in and/or accessible to the public for review of supporting documents.	
70	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	1/2 Noble submitted an application for permit-to-drill (APDs) for three exploration wells on two well pads. The remainder of the well pads and wells would be constructed during the following years. If proven economical, the wells would be produced for an estimated 20 years. Seismic listening wells which may later be converted to production wells may be constructed. Applications (APDs) are not available to or are inadequately linked or reference for public review and considerations. As a federal document, all information for the exploratory wells must be made available for public review and commenting as part of the EIS.	APDs are available in the Public Room of the Elko District Office.
71	Socioeconomics	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	As economic analyses are referenced, the EA should have included economic analysis and criteria and must include such in the EIS.	Potential socioeconomic effects including beneficial effects are discussed in Section 3.4.6 in the EA.
72	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community	The need for the Proposed Action stems from the BLM's legal responsibility to respond to Noble's MSUPO for oil and gas exploration under its mandate to manage public lands according to the	Comment noted.

Comment Number	Category	Organization	Comment Text	BLM Response
		and Sierra Club Water and Fracking, Oil and Gas Committees	Federal Land Policy and Management Act (FLPMA) and the Mineral Leasing Act (MLA), as amended. 5/3 The purpose of the Proposed Action is to explore for and develop oil and gas resources within the Project Area. The action is the application/permit processing for the Applicant to develop and produce for their economic benefit from the Federal resources under the jurisdiction of the BLM. Exploration does not require so many wells and pads. Noble (applicant) has pass the exploration phase and now the applicant's purpose is to develop the Huntington Field with the least interference and costs by external entities.	
73	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	The EA does not clearly and concisely define and consistently use the terms: exploration, production, development (e.g., phase of petroleum operations...after exploration...successful, and before full-scale production... Schlumberger, 2014). Since the entire field with 39 pads has been laid out, the EA must need the ultimate purpose has been planned for and the economic needs would be satisfied.	The Proposed Action is for a maximum of 20 wells on a maximum of 20 well pads. Analyzing 39 pads in the EA gives Noble flexibility to choose which 20 of these pads will be drilled based on 3D seismic results and other future data which will be gained during drilling.
74	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	5/4 1.3 PLAN CONFORMANCE REVIEW The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 Code of Federal Regulations - CFR 1610.5, BLM 1617.3): 5/5 The Project is in conformance with the Elko Resource Management Plan (RMP), as approved	43 CFR 1610.5 is specific to Land Use Planning. We could not locate the reference quoted: BLM 1617.3

Comment Number	Category	Organization	Comment Text	BLM Response
			March 11, 1987 (BLM, 1986a and 1987), and the Programmatic EA for the December 2005 Oil & Gas Lease Sale, which amended the RMP (BLM, 2005). The Record of Decision (ROD) for the Elko Resource Management Plan, page 35, provides, "Maintain public lands open for exploration, development, and production of mineral resources while mitigating conflicts with wildlife, wild horses, recreation, and wilderness resources." The EA does not provide any informative comparisons of the Plan and the appropriate Federal parameters and criteria to allow review of the adequacy and completeness of the simple statement of compliance/conformance. The EIS must include appropriate comparisons with the revised Project Description and quantitative parameters and criteria of conformance.	As stated in the document this project is in conformance with the Elko RMP.
75	Policy and Process	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	8/5 1.5 The BLM...(AO) will decide...to authorize the Proposed Action with Conditions of Approval (COAs). The Decision Record...does, however, provide the...(AO) with information upon which to consider approving individual Project components such as APDs, Rights-of-Ways, and Sundry Notices. The AO generally considers and make a decision either to approve or deny the proposed action, not just decide to approve such proposed action. As indicate in these comments, the information provided by the EA is incomplete, inadequate, and inconsistent for review and consideration.	Comment noted.
76	Proposed Action	Tom Williams,	10/2 2.2.1 Under the Proposed Action...oil and	Abandonment and Reclamation are

Comment Number	Category	Organization	Comment Text	BLM Response
		Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	gas exploratory drilling program...two phases; Construction/Drilling and Production/Operations. As indicated elsewhere, the Project Description is inadequate and incomplete and herein also as the Project must include abandonment and reclamation of the wells, pads, and field. This Action must be extended throughout the life of the Project and all facilities and activities in the requested EIS.	discussed throughout the EA and do occur throughout the two phases discussed. For example, interim reclamation would occur as well pads go into the production phase, temporary road disturbance would be reclaimed immediately after construction, and well abandonment could occur at any time a well is deemed unproductive.
77	Proposed Action Alternatives	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	10/1 ...Proposed Action as well as alternatives, both those analyzed in detail and those considered but not analyzed in detail...analyzed in detail include the Proposed Action Alternative, the Well Pad K2J Access Alternative, and a No Action Alternative. Alternatives considered but not analyzed in detail include two alternate access routes... The Project Description includes pad-well counts from 20 to 39 and 2 to 22, restrictively, and restricts gravel production from only two areas. Therefore numerous reasonable alternatives can be based on 1) the drawings provide for a total of 40-78 wells, 160-312, or 440-800-plus or 2) a balancing of cut-fills to provide required volume and qualities of gravels for pads and roads, or 3) an "environmentally superior alternative" with a combination of minimization, mitigation, and compensatory measures for the real proposed action.	The Proposed Action is for a maximum of 20 wells on a maximum of 20 well pads. Analyzing 39 pads in the EA gives Noble flexibility to choose which 20 of these pads will be drilled based on 3D seismic results and other future data which will be gained during drilling.
78	Proposed Action	Tom Williams, Technical Advisor	2.2.1 PROPOSED ACTION 10/2 Under the Proposed Action, Noble would	All phases of the project (including well abandonment and reclamation)

Comment Number	Category	Organization	Comment Text	BLM Response
		Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	conduct an oil and gas exploratory drilling program in the Huntington Valley Project Area. The project would include two phases; Construction/Drilling and Production/Operations. The Construction/Drilling Phase includes construction of up to 20 exploration/production well pads and drilling and completion of a maximum of 20 exploration wells,... Again a vain attempt to segment the project into pieces in order to avoid preparation of a more comprehensive EIS..	are addressed in the EA. The BLM did not document significant impacts in the EA therefore an EIS is not required.
79	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	10/2 The Construction/Drilling Phase also includes new construction and upgrading of local and resource roads...could drill a maximum of eight water supply wells on eight water well pads...and potentially drill a [=1] disposal/injection well...excavate two gravel pits...for well pad and access road construction. No adequate or complete description, setting or assessment of the injection wells for disposal or flooding has been provided. Such must be included in the EIS.	Surface effects from drilling a disposal/injection well are discussed throughout the EA because the disposal/injection well would be one of the production wells and converted. As stated in the EA: "The disposal/injection well would be permitted through the Nevada State Engineer's Office and NDEP as an Underground Injection Control (UIC) Class II well. Produced water, drilling fluids, and all waste associated with exploration and production of crude oil, natural gas or geothermal energy is regulated by the federal UIC program, and administered in Nevada by NDEP."

Comment Number	Category	Organization	Comment Text	BLM Response
80	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	If a disposal/injection well is constructed, it would be drilled on one of the identified 20 exploration/production well pads. No clear purpose for the injection-disposal is provided although it must be assumed to be for spent stimulation fluids and excess produced water and therefore must be separately permitted and considered from other production wells. No additional injection wells are mentioned for ongoing injection of fluids for production flooding. Within the life of the project, produced water would be required for enhanced oil recovery and injected for water flooding which is excluded from this EA. As the Project Description does not consider such then either the Project Description is seriously deficient or Noble is purposefully avoiding such through segmentation of the Project.	The purpose of an injection-disposal well would be for disposal of produced water as discussed in Section 2.2.1.2.3 in the EA. The Proposed Action does not include ongoing injection of fluids for production flooding/enhanced oil recovery and therefore it is not analyzed in the EA. Noble proposed to transport produced fluids to a certified disposal site (Clean Harbors).
81	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Noble would also excavate two gravel pits within the Project Area to provide gravel for well pad and access road construction. Such gravel pits could be easily incorporated into a high-cut/lower-fill well pad design to generate suitable gravel sizes and volumes within the boundaries of the initial pads. Thus there appears to be no specific needs of additional gravels when such is available in a more distributed pad development program. Portable gravel screening is known in the trade sector.	Noble's Proposed Action includes the use of two existing gravel pits. The BLM has determined that an alternative to eliminate use/expansion of the existing gravel pits is not necessary. During the APD stage if sufficient gravel were located its use would be evaluated, however, our experience shows that gravel resources in Huntington Valley are limited.

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			Such consideration would clearly reduce environmental impacts and lessen the durations and perhaps those from longer distant transport of gravel. The EA appears to be inadequate, incomplete, and not responsive to both protection and sustainability of mineral exploration and production and wildlife, habitat, and other environmental resources and quality within federal lands. The EA must include an alternative to eliminate any separate gravel production site(s).	
82	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	10/3 If...unproductive well during the Construction/Drilling Phase, the well...plugged and abandoned...If a well produces economic quantities of oil, Noble would produce (operate) the well for an estimated 20 years in the Production/Operations Phase...simultaneously (i.e., some wells could be producing while others are still being drilled). No additional surface disturbance would occur during the Production/Operations Phase. Use of terms is sometime confusing - exploration/drilling, construction/drilling, drilling/testing, drilling/completion, development, and exploration and production. The EA must have clearly and concisely defined terms used in the trade (e.g., Schlumberger: http://www.glossary.oilfield.slb.com/en/Terms/d/dev	Comment noted.

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			elopment.aspx) or within the Federal spheres (e.g., https://www.osha.gov/SLTC/etools/oilandgas/glossary_of_terms/glossary_of_terms_a.html). Such terms must then be used consistently throughout the EA or clearly identified when changes are made.	
83	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	10/4 All phases of the Proposed Action...with the Project Design Features and Best Management Practices (BMPs) provided in Noble's MSUPO (Noble, 2014). References are confused and inconsistent. The reference listing cites only Noble Energy, Inc. (Noble). 2014. Master Surface Use Plan of Operations for Huntington Valley Oil and Gas Exploration Project. January, while the online DOI-BLM-E200-NV-2014-0003-EA (5-19-2014) listings provides a listing only to the same titled document of Huntington Valley Oil and Gas Exploration Project Master Surface Use Plan, Nov. 2013 which appears to be inconsistent with the EA (e.g., 41 pads rather than 39).	Noble's current Master Surface Use Plan of Operations (May 2014) is consistent with the EA.
84	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	Also included in the MSUPO are Noble's Fire Prevention Plan Measures,...and a Master Drilling Plan...comply with all applicable Federal Onshore Oil and Gas Orders and all other applicable permits and approvals...would be required to adhere to stipulations protecting sensitive resources that are included on federal leases.	Noble's current Master Surface Use Plan of Operations (May 2014) is consistent with the EA. The BLM did not document significant impacts therefore an EIS is not required.

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			No comparison is provided for public review to confirm compliance, especially with the widespread inconsistencies of the Project Description and some supporting documents. The MSUPO indicates 41 pads have been designated while others indicate 39 pads; in addition documents indicate 2-22 wells per pad which are feasible given the size and arrangements on the pads. An EIS is required for such a project operating for 25-30 years.	BLM analyzed all 39 locations for resource impacts. The operator would use the 3D seismic analysis and future data obtained during drilling to determine which 20 of the locations would be drilled.
85	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	12/1 2.2.1.1 Construction/Drilling Phase The Construction/Drilling Phase includes constructing well pads, drilling water wells (either on an exploration/production well pad or water well pad), drilling and completing exploration wells, excavating gravel pits, and constructing and upgrading access roads periodically over 2 years with a maximum of 5 years. Separation of the widely overlapping "phases" does not reflect the eventual maximum development of all maximum number of wells shown on typical pad drawings of 22 and the designation of up to 39 or 41 pads in the field. Even a five year initial period would be expected to have at least three years of common production and drilling and redrilling on up to 20 pads. The separation into phases confuses review and the public while also avoiding the cumulative impacts of simultaneous drilling, completion, reworking,	The Proposed Action includes a maximum of 20 wells on a maximum of 20 well pads. The maximum effects from overlapping phases (drilling and production at the same time) has been analyzed in the EA.

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			redrilling, production, reclamation, and abandonment. Such confusion must be eliminated or minimized in the EIS.	
86	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	12/1 Noble conducted a 3D Seismic survey in the Huntington Valley Project Area in the fall of 2013. The purpose of the 3D Seismic survey was to allow Noble to select well pad locations. The data from the 3D Seismic survey are currently being analyzed. This statement would suggest that additional analyses are underway and that the EA and well pad locations have not been fully determined. The EA must be based on all appropriate analyses of all available information, especially when it was the subject of earlier NEPA considerations..	BLM analyzed all 39 locations for resource impacts. The operator would use the 3D seismic analysis and future data obtained during drilling to determine which 20 of the locations would be drilled.
87	Proposed Action Geology and Minerals	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	12/1 Noble would use the results of the 3D Seismic Survey, previous 2D Geothermal Seismic programs, and previous well results within the Project Area to select well pad locations that minimize the likelihood of encountering drilling hazards and faults which may act as a conduit for fluids in the reservoir. Statement suggest that the seismic surveys phase of exploration has not been completed for the locating and selection of well pads and that hazards and faults may remain unanalyzed for the EA.	As stated in the EA – Noble will use the seismic data (in addition to other methods) to determine which 20 of the 39 well pads would be constructed. Also see comment #4.
88	Proposed Action Water Resources	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community	12/1 The seismic data would also be used to select locations that allow for separation of the hydrocarbon bearing zones from any potential water resources of the state.	BLM does not have access to proprietary and confidential seismic information. In addition, seismic

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		and Sierra Club Water and Fracking, Oil and Gas Committees	Statement suggest that the seismic surveys information has not been analyzed or completed for the locating and assessment of groundwater and other deeper bedrock water resources are incomplete and unanalyzed for the EA.	survey is not particularly useful for locating and assessing groundwater and deeper water resources. Site specific information will be reviewed at the APD stage. Site specific scientific data gained during the course of exploration will allow BLM to use adaptive management techniques when reviewing and approving future APDs. Appropriate conditions of approval will be applied. See response to Comment #87, above.
89	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	12/2 Noble has identified 39 potential well pad locations;..no more than 20...constructed under the Proposed Action. Therefore with a potential for doubling the number of pads and well 20/160 up to 39/780 remains feasible once survey information has been completely analyzed..	The Proposed Action is for a maximum of 20 wells on 20 well pads. There is no potential for doubling the number of well pads beyond 20 and increasing the number of wells beyond 20.
90	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	12/2 Noble submitted three APDs for construction of two well pads during the first year (Well Pad K2J and Well Pad K1L). One well (K2J-1D) would be constructed on the K2J well pad and two wells (K1L-2D and K1L-1V) would be constructed on the K1L well pad.	Comment noted. APDs are available for Public review in the Public room of the Elko District Office.

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			construct up to 17 well pads and drill up to 17 wells during the second year and beyond. ...up to four of the proposed 17 wells could be horizontal wells... Without access to the referenced APDs the entire discussion falls to inadequate and incomplete and must be revised in the EIS. Based on experience in other western US field, the statement does not clearly define and consistently use terms regarding the well design - up to 4: horizontal, #: vertical, #: slant, #: directional. Without the designation of wells, the statement becomes meaningless and the number 4 becomes arbitrary at the least.	
91	Proposed Action Water Resources	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	16/3 Water Well Pads. Noble has identified eight potential water well pad locations. Noble would attempt to install water wells on the individual exploration/production well pads. If this turns out to not be feasible, the water well pads would be used. It is unlikely that all the water well pads would be used. No definition of feasible is provided, nor are the requirements for volumes and quality provided. No clear discussion and assessment is made for the "water wells" and as to their functions.	Water wells would be used to supply water for drilling, completion, and dust control. The required water volumes for drilling and completing a single well are included in Table 2.2-6 in Section 2.2.1.1.3 in the EA. Estimated volumes for dust control are also provided in Section 2.2.1.1.3.
92	Proposed Action	Tom Williams,	16/3 It is possible that a water well on an	

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	Water Resources	Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	exploration/production well pad and a water well on a water well pad could be used at the same time if two exploration wells are being drilled or completed at the same time. Water well locations were chosen based on proximity to exploration/production well pads and generally placed on private lands. As the two different wells draw from totally different strata, the phrase appears meaningless or distractive. No analyses have been provided for volumes, capacities, and uses of groundwater for well exploration and production. No distinctions are made for water, groundwater, produced water, or formation water, and thereby the true natures of these wells remain inadequately and incompletely described. As an element of the EA, all water wells and related water resources related to this Project must be considered and assessed as part of the EA whether on private or Federal lands. Discussion of water wells also does not clearly distinguish between "Fresh Groundwater" and "Fresh Bedrock Waters", and does not establish the "Base of Fresh Water" nor other usable subsurface or usable water resources". Needs, capacities, and production rates are not provided. An EIS is required.	Potential effects from drilling on-site water wells is addressed in Section 3.2.4 in the EA.
93	Proposed Action	Tom Williams,	21/1 2.2.1.1.2 Well Construction, Completion, and	

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		Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	On-Site Accommodations Well construction includes several activities, starting with well drilling, casing, and testing (evaluation of drill cutting, geophysical logging, and/or drill stem testing). If economic resources are identified, the wells would be completed by additional testing, to ensure casing strength, casing perforation and, if necessary, well stimulation (by hydraulic fracturing). Construction is inadequately described as it misses the critical stage of cementing, but does distinguish between drilling and completion at perforation. Reference to the economic resources and its importance to the well, field, and total project clearly requires clarification as to a mineral-economics analysis for the overall project, including all costs, revenues, bonds, loans, and insurance along with well, pad, and field rates of returns (e.g., 10, 30, 60, 70% IRR/RI).	Section 2.2.1.1.2, Well Construction , and Well Completion, identifies the construction, cementing, completion, and isolation of aquifers and testing zones. BLM does not determine or analyze the economic viability of projects in NEPA documents. BLM's position is that mineral economics analysis is not appropriate for the NEPA analysis. There are a number of reasons including: 1) The NEPA process is to identify potential impacts and appropriate corrective actions, mitigation measures and to make appropriate adjustments to the accepted alternative. 2) The proposed action and alternatives are evaluated on their inherent merits assuming full implementation, including all operation, mitigation, monitoring, reclamation, closure and post-reclamation actions. BLM does not prepare the NEPA analysis assuming there will be deviations from the approved alternative.

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94	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	30/1 2.2.1.2 Production/Operations Phase Once wells are drilled and completed, economically viable wells would be placed into production and operated for up to 20 years. The results of the Proposed Action would help Noble determine whether economic quantities of oil can be produced in the Huntington Valley Area. References to the economic resources, viabilities, quantities and their importance to the well, field, and total project clearly require clarification as to a mineral-economics analysis for the overall project, including all costs, revenues, bonds, loans, and insurance along with well, pad, and field rates of returns (e.g., 10, 30, 60, 70% IRR/RI). As part of the Project Description all such economic-related references must be provide with quantitative measures and the analyses supporting such measures and values.	All changes to a permit require review and approvals from the BLM and NDEP/NDOM. Future work would require an APD or Sundry Notice depending on the proposed action. See response to Comment #93, above.
95	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	30/2 After all wells have been drilled on the well pad, a working area of the pad would be reclaimed to approximately 3.5 acres per well pad and would remain disturbed throughout the Production/Operations Phase...undergo final reclamation when all wells on the pad are abandoned....Permanent stormwater controls and BMPs would be installed on the	Any work-overs after interim reclamation would be done on the 3.5 acre well pad and permitted through a Sundry Notice.

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			exploration/production well pad....Total long-term surface disturbance for 20 well pads is estimated at 70.0 acres. Long-term disturbance refers to bare ground and does not include reclaimed areas. No provisions are made for reworking, redrilling, additional drilling, and re-stimulation/fracking on the pads and such activities would be reasonably anticipated for wells over a 25-30 year expected project life-time.	
96	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	30/3 If the well proves to be economical, production equipment would be installed on the exploration/production well pad after the Construction/Drilling Phase...well pad may include the wellhead, pumping unit, vertical treater, re-circulating pump, one gas flare, two-phase separator building, line heater, generator, four 400-bbl oil tanks, two 400-bbl water tanks and one fuel tank. Standard well design includes two flare - one for light gaseous and one for NatGasLiquids, not just a single combined flare. As part of the Project Description all such economic-related references must be provide with quantitative measures and the analyses supporting such measures and values.	The pad design was provided by Noble in their Master Surface Use Plan of Operations – which includes one flare – see response to Comment #1, above.
97	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community	30/3 If two wells are located on a single well pad, production equipment would be shared to the greatest extent possible.	The Proposed Action includes a maximum of 20 wells on a maximum of 20 well pads. If Noble chooses to drill more than one well on a pad, the

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		and Sierra Club Water and Fracking, Oil and Gas Committees	The conjectural "If" is not supported by typical pad layout including up to 14 or even 22 wells.	total number of well pads allowed would be reduced. In no case, would there be 14 or 22 wells on a well pad.
98	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	31/Fig. 2.2-4 No basis is provided for the requirement to flare gases separately for VOCs (including linear and cyclic natural gas liquids) and presumably methane (which is also a volatile organic compound but not an ozone precursor, nmVOC). As these are separate flares, their use must be preceded by separation facilities which have not been adequately or completely described but which could be located on 20-39 sites throughout the field.	In no case, would there be 39 well pads throughout the field – see response to Comment #97, above. Standard wellhead separation equipment would be used. As stated in the EA, natural gas produced would be used to fuel production equipment. See response to Comment #1, above.
99	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	31/2 All installed production facilities with the potential to leak or spill oil, condensate, produced water...might be a hazard to public and occupational health or safety and to the environment would be placed within an appropriate impervious secondary containment structure that would hold 110 percent freeboard...Secondary containment would consist of corrugated steel containment berms or earthen berms...performed to prevent lateral movement of fluids through the utilized materials...constructed such that transmissivity does not exceed 1x10-7 centimeters per second. All loading lines would be placed inside the containment berm. As no commitment is made to actually conduct compaction tests for the well pads a more	Truck loading for oil and produced water (the only fluids exported from the well pad) would occur at the storage tanks. Noble would implement measures included in their Storm Water Pollution Prevention Plan and their Spill Plan in addition to an engineered well pad design. Secondary containment would be compacted to 1x10-7 centimeters per second (section 2.2.1.2.0).

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			enforceable and demostratable compliance effort would be to require a 100mil HDPE membrane liner with double seam welding beneath all such contained areas and side walls. The listed areas do not appear to include truck loading facilities for all fluids exported from the pad and should be extended to include any such truck loading are. Similarly each pad has a up-slope drainage and collection basin system, while no such system is provided for the downslope drainage controls. Addition drainage collection and detention basins must be incorporated into the designs of those areas downslope of contained areas.	
100	Proposed Action Water Resources	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	32/1 Oil and water ("produced water") would be pumped from the wellhead, separated, and stored in tanks on-site. Noble anticipates that 12 wells would be fully successful and could produce up to 250 barrels (10,500 gallons) each of oil per day and the remaining wells 8 wells could produce up to 100 barrels (4,200 gallons) each of oil per day. No discussion has been provided or supported regarding the well, pad, and field fluid volumes to be "produced" and their disposition to pad/field injection wells or out-of-state transport for disposal. For long-term/Life-of-Project and for assumed successes of all drilling and for a maximum of say	The EA analyzes direct and indirect effects for the maximum volumes of oil and produced water and traffic effects related to the maximum volumes. The proposed action is a maximum of 20 wells on 20 pads. Section 2.2.1.2.3 Water Disposal, identifies the estimated volume of produced water to be approximately 100 barrels (4,200 gallons) per well per day for the 12 wells producing 250 barrels (10,500 gallons) of oil

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			800 well (40 pads x 20 wells), produced water volumes must be disposed of/reused locally as part of typical water flooding and enhanced oil recovery. As this is not described nor asessed, the EA is deemed incomplete and inadequate, and such deficiences must be revised/upgraded in the preparation of an EIS.	per day, and approximately 40 barrels (1,680 gallons per day for the eight wells producing 100 barrels (4200 gallons) of oil per day. With 20 producing wells, there could be as much as 1,520 barrels (63,840 gallons) of produced water per day. As described in Section 2.2.1.2.3 Water Disposal of the EA, one option for produced water disposal would be to truck produced water to an approved disposal facility (Clean Harbors) located between Wendover, Nevada and Salt Lake City Utah.
101	Proposed Action Air Quality	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	32/2 A small amount of natural gas...Excess natural gas may be flared...The well testing would determine if the well is an economic producer of oil. If more gas is produced than anticipated, Noble would apply for approval to install gas pipelines and additional NEPA ????? would be required. Hydrogen Sulfide (H2S) is not expected to be present or released. Noble drilled two wells on private land in Elko County, and no detectable H2S down to 30 ppm (limit of mass spectrometer analysis of mud gas) was found in either well. Based on a review of well histories and logs (Tuano Draw well and the Jiggs federal wells) in Elko County, there is no indication of H2S. Gas chromatograph results of	The information regarding the possibility of H2S is provided by Noble in the Master Surface Use Plan of Operations. Noble is drilling wild cat wells in a formation not previously explored. They hold the only data that exists and exploration would provide further data.

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			drilling mud from the isotube detected no H2S. Any natural gas produced will be tested for H2S content. No direct or indirect supporting information regarding H2S levels, non-detection levels, or occurrences has been provided and therefore the referenced to other private lands wells must be provided in the EIS. No parameters, analyses, or criteria for "an economical producer" have been given. Reference to NEPA is not explained unless referring to preparation of categorical exemption, EA, or EIS would be considered for any subsequent segment of the proposed action/Project. No information is provided regarding expected or assumed Condensate/NGL/nmVOC levels although a VOC Flare is included in pad production facilities along with a more normal flare, presumably for mostly methane releases.	
102	Proposed Action	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	32/4 Up to 30 percent of the water could be provided by off-site sources (Spring Creek Utilities), if necessary for backup. Other methods of dust control could also be used, if approved by the BLM. Constructing roads to Gold Book Standards may reduce water consumption for dust control. The EIS must clearly state that no produced, recovered, or otherwise oil-related waters shall be used for control of dust or other ground applications.	Water used for dust control would be obtained from on-site water wells or from the backup source – neither of which contain oil-related waters or produced water.

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103	Proposed Action Water Resources	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	33/2 2.2.1.2.3 Water Disposal Recovered water includes the flowback water injected during well completion and formation water condensate (produced water) in the production stream. The amount of water recovered...may be estimated over a field of several wells...produced water would include approximately 100 barrels...per well per day [1200bpd] for the 12 wells producing 250 barrels...of oil per day [20+ bpd/well???], and approximately 40 barrels...per well per day [320bpd] for the eight wells producing 100 barrels...of oil per day [12bpd/well]. With 20 producing wells, there could be as much as 1,520 barrels...of produced water per day [for 350 bpd of oil; 20% oil or 5/1 total/oil cut ratio]. Produced water would be stored in steel tanks on the production well location. Estimates provided (i.e., 350bpd for 20 wells rather than per well) and the derivative Oil/Water ratio of 1/4 appear inconsistent, lower than expected, with the primary nature of the field, absence of gas, and absence of H2S. Based on other estimates for Workforce, Water Disposal, and Transport which don't refer to bbl/well/day, the estimates may be confused and that oil production may be 250/100 and 100/40 bbl/day per well for two wells i.e. initial pad production of 250+100 bpd oil and 140 bpd produced water which the EA assumes to be on each pad.	See response to comment # 100.

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			The estimate would also require filling/unloading of only four 400bbl produced water tanks every day for 20 pads. Such an estimate also has implications for maximum pad and field developments and water separation, storage, and disposition. With 10-20 producing wells per pad, water would increase the transport from low: 40bpt x 4t/d to say 4t/d x 20 or 40 pads for the field. Thus requiring local disposition. The confusion presented needs to be addressed in a well edited EIS.	
104	General	Tom Williams, Technical Advisor Citizens Coalition for a Safe Community and Sierra Club Water and Fracking, Oil and Gas Committees	MANY MORE COMMENTS CAN BE MADE AVAILABLE IF SUBMISSIONS AFTER 06/09/14 WILL BE INCLUDED.	The review period was extended from June 6th 2014 to June 24th 2014 – an additional 18 days.
105	Policy and Process	Great Basin Resource Watch	Great Basin Resource Watch (GBRW) is primarily concerned that the scope of the EA is too limited, and that the Bureau of Land Management (BLM) should prepare a full environmental impact statement (EIS). BLM has violated NEPA by failing to produce an EIS because the exploration and oil and gas operations that may result could clearly result in significant impacts. This is especially true in light of the potential for hydraulic fracturing, fracking, to occur.	The BLM did not document significant impacts therefore an EIS is not required.

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106	Cumulative	Great Basin Resource Watch	The EA failed to review the "cumulative impacts" from all "past, present, and reasonably foreseeable future actions" under the National Environmental Policy Act (NEPA), 40 CFR Section 1508.7. For example, while there is some mention of the use of hydraulic fracturing during the exploration, what is a real foreseeable action is to use fracking in the extraction of oil and gas after exploration. There is no mention of this in the cumulative impacts section, and it is clear just from the water use analysis that future drafts of groundwater for fracking for extraction is not under consideration.	Reasonably foreseeable future actions (RFFAs) within the Cumulative Effects Study Areas are listed in Section 3.1 in the EA. To be included in the list of RFFAs, a proposed future action must have a high probability of occurrence and be defined well enough to consider in any cumulative effects analysis. There are no projects proposed by Noble or anyone else for hydraulic fracturing beyond what is discussed in the Proposed Action.
107	Water Resources	Great Basin Resource Watch	If production fracking were considered as a foreseeable action, then the potential water use would be considerable higher than that stated in the EA, which is, "Project water use for all purposes is 3 acre-feet in the first year and 23 acre-feet in the second year." (pg. 116). On average about 15 acre-feet of water is used to frack one well to stimulate production, and if 20 (the EA does indication the potential for more well in the future) of the wells are fracked for production then there would be around 300 acre-feet of water removed from the basin, which is a considerable amount relative to other users like ranchers.	Hydraulic fracturing is considered in the analysis of the Proposed Action. Noble has not proposed any additional hydraulic fracturing within the CESA other than that included in the Proposed Action.
Business and Industry				
108	General Support	Southgate Resources	Southgate Resources understands well the tremendous economic and environmental benefits that natural gas presents for the United States. In	Comment noted.

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			order to ensure these economic and environmental gains continue, the BLM should only pursue processes that that encourage - not hamper- safe energy production and that acknowledge the historical safety record of hydraulic fracturing.	
109	General Support	Consumer Energy Alliance	CEA understands well the tremendous economic and environmental benefits that natural gas presents for the United States. In order to ensure these economic and environmental gains continue, the BLM should only pursue processes that that encourage - not hamper- safe energy production and that acknowledge the historical safety record of hydraulic fracturing.	Comment noted.
110	General Support Mitigation	Noble Energy	We stand by the mitigation plans and measures in our proposed action, the Master Surface Use Plan, and as described in the draft EA. In the communities where Noble operates, we have a proven track record of responsible exploration and development both offshore and onshore U.S., most notably in the Denver-Julesberg Basin in Colorado and the Marcellus region in Pennsylvania and West Virginia. In these areas, Noble Energy is a leader in implementing best management practices, and working with state and federal agencies to continuously improve regulations and operating conditions. We are committed to doing the same in Elko County.	Comment noted.
111	General Support Water Resources	Noble Energy	On the matter of water management, Noble is leading the industry in Colorado in efforts to test and monitor groundwater, use water from non-tributary sources outside of the hydrologic cycle, and in	Comment noted.

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			develop recycling capacity. Noble will bring this life-cycle water management model t to Nevada. We are also fully committed to the joint water quality study being conducted by the Desert Research Institute because we believe it will provide useful groundwater data that can be used to improve Nevada's understanding of the hydrology in the basin, and our understanding of the best ways to develop an exploration and development program.	
112	General Support Cultural Resources - Visual	Noble Energy	We also agree with the BLM's proposed alternative to mitigate visual impacts for segments of the California National Historic Trail. The BLM's work on this part of the EA with the State Historic Preservation Office, Tribes and Noble will result in project development that minimizes impacts to surface features, including the important National Historic Trails that are important to so many people. While these mitigation measures remove some options for Noble to test the geologic formation, we can work with the approach crafted by the BLM.	Comment noted.
113	General Support	Noble Energy	Noble Energy believes that there are significant and attainable oil resources in Nevada that could contribute to the nation's domestic energy production, and provide important economic diversification to Nevada's economy. We believe we can explore for this important resource responsibly in order to have the economy we want and the energy we need. This EA is an important step and we appreciate the hard work of the BLM team.	Comment noted.
114	General Support	Chamber of Reno	The BLM EA should proceed because it will benefit Nevada. Noble has shown that it is a proactive,	Comment noted.

Comment Number	Category	Organization	Comment Text	BLM Response
			innovative and effective steward of the environment in terms of water preservation and recycling, protection of endangered species and reduction of footprints.	
Individuals				
115	Air Quality	Dawn Harris	AIR QUALITY AND PUBLIC HEALTH - Public Land is supposed to be for multi-use. When this industry is in operation, air quality in small rural communities and in wilderness areas will be worse than areas like Los Angeles. If BLM allows this to occur they will have failed at their task of multi use on public land.	Potential effects to air quality are discussed in Section 3.2.1 in the EA. The BLM has prepared emissions inventories for construction and operations and are included in the EA. Construction emissions would be temporary. Production emissions would be expected to comply with the National Ambient Air Quality Standards and the Nevada Ambient Air Quality Standards.
116	Water Resources	Dawn Harris	WATER QUALITY AND PUBLIC HEALTH -As stated above, public land is designated for multi use purposes. With water usage and water contamination issues, this directly impacts wildlife, recreation, ranching and agriculture, and unknown future impacts to aquifer and ground water supplies.	Potential effects to water quality and water use are discussed in Section 3.2.4 in the EA. The BLM has included mitigation to minimize impacts to water quality and water use that could result from the Proposed Action. Also, see response to Comment #125, below.
117	Water Resources	Dawn Harris	In addition to drilling through water aquifers and the potential of contamination through that route, there are few additional pathways of potential water contamination. Transportation spills of fracking fluid, well casing leaks, leaks through fractured	These potential effects are addressed in Section 3.2.4 in the EA and BLM has included mitigation measures to minimize these effects.

Comment Number	Category	Organization	Comment Text	BLM Response
			rock, drilling site seepage, and wastewater disposal.	Also, see response to Comment #125, below.
118	Water Resources	Dawn Harris	Now to discuss water usage. There is quite a bit of popular press discussion about how the fracking industry uses less water than golf courses or dairy farms. The reality is a fracking event can use 4 million gallons of water for a single frack. This is an industry number and in reality is probably higher. Nevada cannot spare any water, let alone this amount even if it is considered a "temporary use". Temporary use of 2, 3, 5, 10+ years in any amount of water is destructive to the people, ranchers, agricultural farmers, recreation uses, and wildlife. We cannot support fracking in our state for the water usage issue alone.	See EA sections 2.2.4.2 & 3.2.4.2 & 3.2.4.6.
119	Water Resources Public Health	Dawn Harris	HARM TO FOOD SYSTEM - Researchers are concerned that farm animals that die from drinking seeped fracking fluid and others like them will be ground up into feedstock, which will be fed to chickens and pigs. To make this e\en more complicated, there are currently no tests being conducted on livestock or agricultural products for fracking fluids.	Comment noted.
120	Geology and Minerals	Dawn Harris	NEVADA GEOLOGY- Nevada has complex geology with thin crust areas and intense seismological activity. It is illogical to drill and fracture in a state where the earth's mantle is only 12 miles down and the potential for earthquakes and other seismological activities is high.	Comment noted.
121	Water Resources	Dawn Harris	ANCIENT AQUIFERS -We ha\e no business drilling through and potentially contaminating	Comment noted.

Comment Number	Category	Organization	Comment Text	BLM Response
			pristine, ancient water systems. Water is too precious.	
122	Land Use	Dawn Harris	PATCHWORK LAND OWNERSHIP- Nevada has patchwork land ownership. Drilling on one section of land will affect adjacent areas and the majority of rural residents and tribal members do not want fracking surrounding their land.	Comment noted.
123	Energy Policy and Process	Dawn Harris	We need to eliminate the oil and gas industry's activities simply because they are destructive. It has been shown that the benefits do not exist except to those who ha\e a financial stake. The methane released from the extraction process contributes significantly to climate change and therefore negates any perceived benefits. Additionally, the job claims are false as are the financial gains once you back out all of the costs such as highway repairs from the heavy truck traffic and other costs of this industry doing business in our state. The industry is also excluded from the Super Fund Act (CERCLA) so spills and accidents will fall on the state of Nevada to rectify. I verified this fact in the US Code. The oil and gas industry is excluded from the Super Fund Act.	Comment noted.
124	General Opposed Fracking	Dawn Harris	Moving forward in light of all of the peer-reviewed data and the personal testimony of those who are directly impacted by hydraulic fracturing would be a grave mistake for Nevada and the BLM. I strongly urge you to cancel this and all other exploration and drilling which utilizes hydraulic fracturing and instead create multi use arrangements with solar and wind industry which is a win-win financially,	Comment noted.

Comment Number	Category	Organization	Comment Text	BLM Response
			ecologically, and is in line with BLM's purpose.	
125	Grazing Water Resources	Adela Morrison	I have cattle near the drilling North of Wells and am deeply concerned that continued drilling may make water coming from the Humboldt wells toxic. Why has the BLM allowed this to happen?	Huntington Valley Project is located approximately 36 miles southwest of Wells. As stated in the EA: " Noble has entered into a Memorandum of Understanding (MOU) with the State of Nevada through the NDOM, the NDEP, and the Board of Regents of the Nevada System of Higher Education on behalf of the Desert Research Institute (DRI) to establish the Aquifer Quality Assessment Program (Aqua Program) to gather and share data and information on groundwater and geological conditions associated with the fate and transport of chemicals used for hydraulic fracturing." In addition, the BLM would require well, spring, and stream sampling on a semi-annual basis until wells are plugged and abandoned.
126	Water Resources	Adela Morrison	The Humboldt River starts at the wells outside of Wells and I wouldn't want anything to jeopardize the beauty and natural resources under the ground that we can't see.	Comment noted.
127	Geology and Minerals	Adela Morrison	I reside close to the epicenter of the Earthquake in 2008 and reliving another earthquake of that	A discussion of earthquakes as a result of hydraulic fracturing is

Comment Number	Category	Organization	Comment Text	BLM Response
			magnitude frightens me to no end. Fracking so close to this site could cause another earthquake.	discussed in the EA in Section 3.2.2.2.
128	General Opposed Fracking	Adela Morrison	Please re-address your environmental assessment and DO NOT allow Noble Energy to continue fracking in Nevada and more importantly in Elko County. If the BLM is truly managers of the land, then you would think that NO oil company would be allowed to frack on any federal land jeopardizing the environment.	Potential effects from hydraulic fracturing are addressed in Section 3.2.4.6 in the EA.
129	General Opposed Fracking	Nicole Higgins	Please understand that I object to this type of drilling. I object to this polluting of so much water in a state that does not have enough water to begin with. I object to fracking. I object to the continued reliance on an energy that is causing climate change.	Comment noted.
130	General Opposed Fracking	Steve Davis	I understand that oil and gas companies have proposed fracking in Nevada. I am very opposed to this because it will pollute the precious groundwater in Northern Nevada and it will trigger earthquakes in an already earthquake-prone region. Instead of polluting NVs most limited resource, water, we should be tapping NVs most abundant resource (sunshine) Please do not allow fracking in NV.	Comment noted.
Form Letter				
131	General Support	Form Letter 1	The BLM should only pursue processes that encourage - not hamper - safe energy production and that acknowledge the historical safety record of hydraulic fracturing. Energy development will contribute to government coffers at both the Federal and state levels The revenues generated from oil and gas production could be extremely beneficial to the people of Nevada.	Comment noted. BLM received 103 copies of this form letter.

Comment Number	Category	Organization	Comment Text	BLM Response
132	General Support Socioeconomics	Form Letter 1	We know some drilling jobs are temporary, but, overall Oil and Gas development in Nevada will require long-term expertise. Individuals with technical, administrative, and labor skills will compete for newly created and well- paying jobs. Some of these jobs include: Well Operators, Welders, Truck Drivers, Electricians, Pipefitters, Heavy Equipment Operators, Technicians, Engineers, Geologists, Accountants, Land men, Administrative Support, HR, Dispatch, Hydraulic Fracturing Crews, Casing Crews, Equipment Suppliers, Computer Technicians, and Data Entry Specialists.	Comment noted. BLM received 103 copies of this form letter.